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April 20, 2023

**By ECF**

Honorable Robert M. Levy  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Government Employees Insurance Company et al. v. Konata Solomon Stallings (A Sole Proprietorship), et al.**  
**Docket No.: 1:22-cv-06306-DG-RML**

Dear Magistrate-Judge Levy:

I write on behalf of Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (collectively "GEICO" or "Plaintiffs") pursuant to the Court's March 21, 2023, Order.

Following the March 21, 2023, conference, we became aware that Defendant Konata Solomon Stallings, Psy.D. ("Stallings") filed a petition for bankruptcy in the United States Bankruptcy Court for the Eastern District of New York, under Case No. 23-40904-ess (the "Bankruptcy Proceeding"). No substitute counsel has appeared on behalf of Stallings in this action and Stallings' counsel in the Bankruptcy Proceeding has not filed a notice in this action. Because the petition has been filed seeking relief under Chapter 7, a Trustee has been appointed and we are speaking with the Trustee next week in an effort to resolve the claims against Stallings and his sole proprietorship. In the event that we cannot reach a successful resolution, we are likely to file a motion to lift the automatic stay so that we can pursue the claims against Stallings in this Court as well as against remaining defendants.

We would, therefore, ask the Court to set a status report order for 30 days to give us the opportunity to address the bankruptcy related issues.

Respectfully submitted,

RIVKIN RADLER LLP

A handwritten signature in black ink that reads "Barry I. Levy".

Barry I. Levy

cc: All counsel via ECF